

# EXHIBIT 68

CONFIDENTIAL



## Transcript of **Andrea Sferes**

Tuesday, April 19, 2022

*National Coalition on Black Civic Participation, et al. v. Jacob Wohl, et al.*

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Reference Number: 115542

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 -----  
4 NATIONAL COALITION ON BLACK CIVIC PARTICIPATION,  
5 MARY WINTER, GENE STEINBERG, NANCY HART, SARAH  
6 WOLFF, KAREN SLAVEN, KATE KENNEDY, EDA DANIEL and  
ANDREA SFERES,

7 Plaintiffs,

8 -and-  
9

10 People of the STATE OF NEW YORK, by its Attorney  
11 General, LETITIA JAMES, ATTORNEY GENERAL OF THE  
STATE OF NEW YORK

12 -vs-

13 JACOB WOHL, JACK BURKMAN, J.M. BURKMAN & ASSOCIATES,  
14 LLC, PROJECT 1599, MESSAGE COMMUNICATIONS, INC.,  
ROBERT MAHANIAN and JOHN and JANE DOES 1-10

15 Defendants.  
16 -----  
17

18 Deposition of ANDREA SFERES taken via Zoom on  
19 Tuesday, April 19, 2022 at 10:00 a.m., before  
20 Deirdre Smith, a stenographer and notary public  
21 within and for the State of New York.  
22  
23

24 CONFIDENTIAL  
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1 A P P E A R A N C E S

2

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18 BY: COLLEEN FERITY

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1 A. Can you repeat the question?

2 Q. Sure. So, what irrefutable harm did you  
3 face at the time you filed the amended complaint on  
4 November 22, 2020 --

5 MR. EPSTEIN: Objection.

6 Q. -- as you allege in paragraph 100?

7 A. I mean I'd say emotionally I felt very  
8 stressed when I received the call and that, you  
9 know, was uncomfortable for me.

10 Q. Did you feel like that on, after the  
11 election on November 22, 2021?

12 A. The election in 2021? I'm sorry?

13 Q. So, when you filed -- the amended  
14 complaint was filed on November 22, 2021.

15 A. Au-hau.

16 Q. Do you still feel the same?

17 A. I -- I feel some anxiety knowing that  
18 this, these sort of falsehoods and such things are  
19 going on.

20 Q. Previously today you testified that you  
21 felt scared momentarily. So, is it fair to say that  
22 you weren't still scared November 22, 2021?

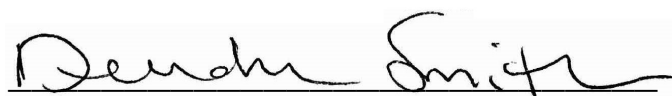
23 MR. EPSTEIN: Objection.

24 A. I did not feel scared for my medical bills  
25 being discovered.

## C E R T I F I C A T I O N

THIS IS TO CERTIFY, THAT I, DEIRDRE M. SMITH,  
on Tuesday, April 19th of 2022, reported the  
proceedings contained in the foregoing 64 pages at  
the time and place as set forth in the heading in  
the foregoing matter. That the transcript is a true  
and accurate transcription of my stenographic notes,  
using Computer Aided Transcription, to the best of  
my ability.

IN WITNESS WHEREOF, I have hereunto set my had  
this 29th day of April, 2022.



Deirdre M. Smith